## IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

)	Case No. 19-23887-JAD
)	
)	Chapter 13
)	-
)	Related to Doc. No.:
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## **DECLARATION**

I, Albert G. Reese Jr., Esquire, attorney for the above-referenced Debtor, hereby submit this formal written Declaration that the existing Chapter 13 Plan is sufficient to fund the plan with the modified debt for the following reason:

Pursuant to Wilmington Savings Fund Society's Notice of Mortgage Payment Change dated December 5, 2024, the Debtor's current escrow payment for account number ending in **3537** is **\$495.21**. The new escrow payment is **\$475.52**. The new total mortgage payment is **\$914.52**, effective January 1, 2025. Debtor to pay any shortage.

Dated: December 6, 2024

Respectfully submitted by:
/s/ Troy R. Sheffield
Troy R. Sheffield

Dated: **December 6, 2024** 

Respectfully submitted by: /s/ Albert G. Reese, Jr., Esquire
Albert G. Reese, Jr., Esquire
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